

## REMARKS

1. In response to the Office Action mailed December 16, 2004, Applicant respectfully requests reconsideration. Claims 45-66, 68, 69 and 76-94 were last presented in this application. In the outstanding Office Action claims 45, 46, 48, 68, 69, 86, 87 and 90 were rejected; claims 47, 49-66, 88, 89 and 91-94 were objected to; and claims 76-85 were allowed. By the foregoing Amendments, claims 45, 86 and 94 have been amended and claims 95-98 have been added. Claim 90 has been canceled. Thus, upon entry of this paper, claims 45-66, 68, 69, 76-89 and 91-98 will be pending in this application. Of these forty-six (46) claims, four (4) claims (claim 45, 76, 86, and 95) are independent. These Amendments are believed not to introduce new matter and their entry is respectfully requested.

### *Allowable Subject Matter*

2. Applicant notes with appreciation the Examiner's indication that claims 76-85 are allowable and that claims 47, 49-66, 88, 89 and 91-94 would be allowable if combined with their respective base and intervening claims.

### *Claim Rejections*

3. Claims 45, 46, 48, 68, 69, 86, 87 and 90 have been rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,195,267 to MacDonald, Jr. *et al.* (hereinafter, "MacDonald"). Based upon the above Amendments and following Remarks, Applicant respectfully requests reconsideration and withdrawal of these rejections.

4. With regard to independent claim 45, the Examiner contends that because the process limitation added by prior amendment does not result in a structural difference to claim 45, such limitation cannot impart patentability to the claimed product. Without commenting on the propriety of this rejection, Applicant has amended claim 45 to relieve the Examiner's concern.

5. Specifically, Applicant has amended claim 45 to place the subject limitation in the form of an apparatus claim limitation. Applicant reminds the Examiner that the Examiner had previously indicated that the inclusion of this process limitation (formerly included in dependent claim 67) into claim 45 (the independent claim from which claim 67 directly depended) would make claim 45 allowable. Accordingly, claim 45, as amended, has a scope

previously indicated allowable by the Examiner. Reconsideration and withdrawal of the Section 102 rejection of claim 45 is, therefore, respectfully requested.

6. In rejecting claim 86, the Examiner stated that MacDonald discloses aluminum oxide, which has a thermal conductivity of at least 20 W/mK. (*See*, Office Action at pg. 2.) Applicant has amended claim 86 to recite "a thermally conductive dielectric coating comprising....an electrically nonconductive thermal loading material having a thermal conductivity of at least approximately 36 W/mK." MacDonald fails to teach or suggest a dielectric coating comprising magnesium oxide, boron nitride, or any other material having a thermal conductivity of at least 36 W/mK. Applicant, therefore, respectfully submits that MacDonald fails to teach or suggest the limitations of amended claim 86. Applicant therefore respectfully requests that the Examiner reconsider and withdraw this rejection of claim 86.

7. Applicant has also added new independent claim 95 and claims 96-98 which depend from independent claim 95. Independent claim 95 combines the limitations of allowable dependent claim 88 with its base claim (claim 86) and intervening claims (none). Applicant therefore respectfully submits that new independent claim 95 is in condition for allowance.

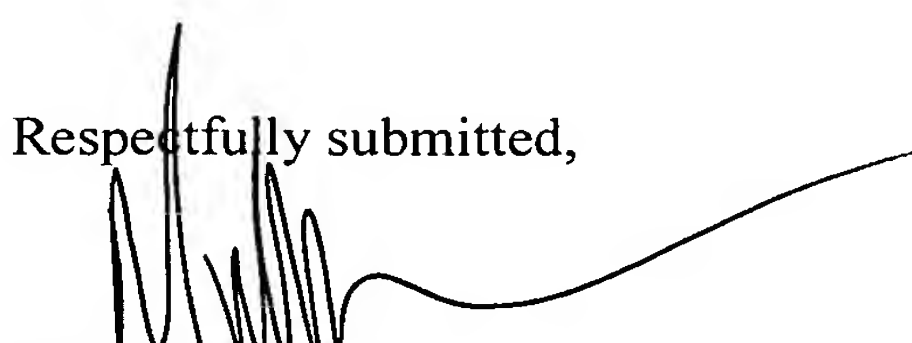
#### ***Dependent Claims***

8. The dependent claims incorporate all of the subject matter of their respective independent claims and add additional subject matter which makes them a fortiori and independently patentable over the art of record. Accordingly, Applicant respectfully requests that the outstanding rejections of the dependent claims be reconsidered and withdrawn.

#### ***Conclusion***

9. In view of the foregoing, this application should be in condition for allowance. A notice to this effect is respectfully requested.

Respectfully submitted,



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